

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MARY PHILLIPA SLEDGE, MARY
JANE PIDGEON SLEDGE TRUST, and
PIDGEON SLEDGE FAMILY LIMITED
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and
CLEAL WATTS, III,

Defendants.

**DECLARATION OF ROBERT L. CRAWFORD IN SUPPORT
OF ATTORNEYS' FEE AWARD**

I, Robert L. Crawford, pursuant to the provisions of 28 U.S.C. §1746, do hereby declare:

1. I am an adult resident citizen of Shelby County, Tennessee.
2. I am also an attorney, licensed to practice law in the state of Tennessee and have been in private practice for approximately 35 years.
3. I am not, and have not been, involved in the above-captioned litigation in any way.
4. I am familiar with the prevailing rates charged in the community by attorneys litigating cases involving allegations of fraud and complicated financial transactions, non-resident defendants and non-local witnesses.
5. Attorneys in Shelby County participating in such litigation would ordinarily charge at least \$350 per hour for senior attorneys and at least \$200 per hour for associate

attorneys. Alternatively, attorneys participating in such litigation might take a contingency interest in the outcome of up to one-third of any recovery.

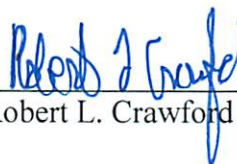
6. Counsel for the Plaintiffs in this matter have told me that they charged the following rates during the course of this litigation:

- a. From May 2013 through January 2015, Anthony Pietrangelo billed \$315 per hour, John Cook billed \$290 per hour, and associate Darrell Phillips billed \$180 per hour.
- b. From January 2015 to present, Anthony Pietrangelo and John Cook dropped their hourly rate to \$145 per hour and Darrell Phillips dropped his rate to \$90 per hour. In exchange for these reduced rates, Plaintiffs agreed in writing to give Pietrangelo Cook PLC a sixteen percent (16%) interest in any ultimate recovery.

7. Based on my experience, these rates are less than or comparable to those attorneys practicing in Memphis would charge to provide similar services and are reasonable in light of what these lawyers have told me about the litigation.

I certify under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of March, 2016.



Robert L. Crawford